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~~EXHIBIT A~~

5 Counsel for Defendant CISNEROS-RODRIGUEZ

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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,) No. CR 11-00744-DLJ
12)
Plaintiff,) STIPULATION AND []
13 vs.) ORDER CONTINUING HEARING DATE
14) AND EXCLUDING TIME UNDER THE
XOCHITL CISNEROS-RODRIGUEZ,) SPEEDY TRIAL ACT
15)
Defendant.)
16 _____)
17

18 **STIPULATION**

19 Defendant Xochitl Cisneros-Rodriguez, by and through Assistant Federal Public
20 Defender Varell L. Fuller, and the United States, by and through Special Assistant United States
21 Attorney Ann Marie Ursini, hereby stipulate that, with the Court's approval, the status hearing
22 currently set for Thursday, September 27, 2012, at 9:00 a.m., shall be continued to Thursday,
23 October 18, 2012, at 9:00 a.m.

24 The reason for the requested continuance is counsel for Ms. Cisneros-Rodriguez requires
25 additional time to prepare and submit briefing to government counsel regarding an issue relevant
26 to a possible negotiated disposition. Defense counsel respectfully request additional time to

1 effectively prepare Ms. Cisneros-Rodriguez's defense, and therefore respectfully requests a
2 continuance of the status hearing previously set in this matter to October 18, 2012.

3 Accordingly, the parties agree that the time between September 27, 2012, and October
4 18, 2012, may be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv),
5 for effective preparation by defense counsel.

6
7 Dated: September 26, 2012

8 _____/s/
VARELL L. FULLER
Assistant Federal Public Defender

9
10 Dated: September 26, 2012

11 _____/s/
ANN MARIE URSINI
Special Assistant United States Attorney

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17 **[] ORDER**

18 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
19 ORDERED that the hearing currently set for Thursday, September 27, 2012, shall be continued
20 to Thursday, October 18, 2012, at 9:00 a.m.

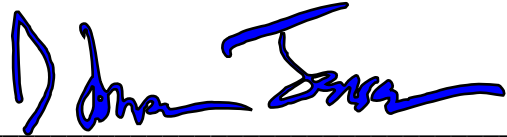
21 THE COURT FINDS that failing to exclude the time between September 27, 2012, and
22 October 18, 2012, would unreasonably deny the defendant reasonable time necessary for
23 effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §§
3161(h)(7)(B)(iv).

24 THE COURT FINDS that the ends of justice served by excluding the time between
25 September 27, 2012, and October 18, 2012, from computation under the Speedy Trial Act
26 outweigh the interests of the public and the defendant in a speedy trial.

1 THEREFORE, IT IS HEREBY ORDERED that the time between September 27, 2012,
2 and October 18, 2012, shall be excluded from computation under the Speedy Trial Act, 18
3 U.S.C. § 3161(h)(7)(A) and (B)(iv).

4 IT IS SO ORDERED.

5 Dated: JED:BJG



THE HONORABLE D. LOWELL JENSEN
United States District Judge